

### **REMARKS**

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1, 3, 4, and 7-13 are pending in the present application. Claims 1, 3, 4 and 7-9 have been amended, and Claims 10-13 have been added, all without the introduction of any new matter.

In the outstanding Office Action, the Claims 1, 3, 4, and 7-9 were rejected under 35 U.S.C. § 102(b) as anticipated by Webster, et al. (U.S. Patent No. 6,227,516, herein "Webster"); and Claims 1, 3, 4, and 7-9 were rejected under 35 U.S.C. § 102(b) as anticipated by Francovich, et al. (U.S. Patent No. 5,828,547, herein "Francovich").

Claims 1, 3, 4, and 7-9 were rejected under 35 U.S.C. § 102(b) as anticipated by Webster. That rejection is respectfully traversed.

Amended independent Claim 1 is directed to a screwless apparatus for attaching a computer drive to a computer chassis. The screwless apparatus includes a mounting clip and a securing clip. The mounting clip is coupled to the computer chassis and has one or more flexible tabs. The securing clip is detachably coupled to the mounting clip. The securing clip is configured for selective engagement with the mounting clip and the computer drive. The securing clip includes a securing pin configured for selective engagement with a screw hole of the computer drive, and one or more flexible tabs configured for selective engagement with the one or more flexible tabs of the mounting clip.

Similarly, amended independent Claims 4 and 9 are respectively directed to a screwless apparatus and method that each include a mounting clip that is coupled to the computer chassis and a securing clip detachably coupled to the mounting clip.

In a non-limiting example, Figures 1-4 illustrate that detachable securing clip 1 includes flexible tabs 8 and securing pins 2 and that clip mounting features 3 are attached to the chassis 4. Securing pins 2 of the securing clip 1 are positioned through pin alignment holes 7 of the chassis 4 and into standardized screw holes 6 of a computer drive. The securing clip 1 is detachable

attached to the computer chassis 4 by resiliently engaging flexible tabs 8 with clip mounting features 3. Thereby, securing clip 1 is configured to selectively engage the clip mounting features 3 and the computer drive. See also page 3, line 16 to page 4, line 7.

Webster does not teach or suggest a securing clip that is detachably coupled to a mounting clip that is coupled to the computer chassis. Instead, Webster discloses a latching mechanism 31 that is "permanently mounted" in side walls 17 of tray 11. See column 2, lines 4-20. Additionally, Webster does not teach or suggest a screwless apparatus that includes both a mounting clip and a securing clip. Instead, Webster merely discloses a latching mechanism 31 and an elongated groove or channel 33 in side walls. See column 2, lines 5-10. Applicant respectfully submits that the elongated groove or channel disclosed by Webster is not equivalent to the mounting clip of the claimed invention.

Accordingly, it is respectfully requested this rejection be withdrawn.

Claims 1, 3, 4, and 7-9 were rejected under 35 U.S.C. § 102(b) as anticipated by Francovich. That rejection is respectfully traversed.

Francovich does not teach or suggest a securing clip that is detachably coupled to a mounting clip that is coupled to the computer chassis. Francovich discloses a U-shaped mounting bracket 90 which facilitates slidable insertion of a computer drive into channels of housing 86. See Fig. 9; col. 6, lines 46-48. Four pins 94 are provided such that they may protrude within threaded apertures 76 of a computer drive 70 without threaded engagement. See Figs. 8; col. 5, lines 50-53. Outwardly projecting tabs 96 are provided to engage within slots 98 in housing 86. See Fig. 9; col. 6, lines 54-57. As such, slots 98 are permanently formed in housing 86 and, thus, not detachable. Additionally, Francovich does not teach or suggest a screwless apparatus that includes both a mounting clip and a securing clip. Instead, Webster merely discloses projecting tabs 96 and slots 98 in housing 86. Applicant respectfully submits that slots 98 disclosed by Francovich are not equivalent to the mounting clip of the claimed invention.

Accordingly, it is respectfully requested this rejection also be withdrawn.

Additionally, Applicant submits that new Claim 10 is allowable because the applied art

does not teach or suggest a mounting clip that include a pair of parallel flexible arms movable relative to each other, a securing clip that includes a pair of parallel flexible arms movable relative to each other, and the flexible arms of the mounting defining an area to resiliently receive the flexible arms of the securing clip, as recited in the claimed invention.

Applicant submits that new Claim 11 is allowable because the applied art does not teach or suggest an attachment means for detachably coupling the securing clip to the computer drive, as recited in the claimed invention.

Applicant submits that new Claim 12 is allowable because the applied art does not teach or suggest a securing pin that is formed from and extending as a portion of the securing clip, as recited in the claimed invention.

Applicant submits that new Claim 13 is allowable because the applied art does not teach or suggest a securing clip that is detachably coupled to a mounting portion of a computer chassis, as recited in the claimed invention.

## CONCLUSION

In light of the arguments set forth above, Applicant respectfully submits that the Application is now in allowable form. Accordingly, Applicant respectfully requests consideration and allowance of the currently pending claims.

It is believed that no additional fees are due at this time. If this is incorrect, Applicant hereby authorizes the Commissioner to charge any fees, other than issue fees, that may be required by this paper to Deposit Account No. 07-0153. The Examiner is respectfully requested to call Applicant's Attorney for any reason that would advance the current application to issue. Please reference Attorney Docket No. 124795-1004.

Dated: March 16, 2006

Respectfully submitted,

GARDERE WYNNE SEWELL LLP

A handwritten signature in black ink, appearing to read 'Karl L. Larson', written over a horizontal line.

Karl L. Larson  
Registration No. 41,141

ATTORNEY FOR APPLICANT

3000 Thanksgiving Tower  
1601 Elm Street  
Dallas, Texas 75201-4761  
(214) 999-4582 - Telephone  
(214) 999-3623- Facsimile